

Exhibit 6

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

AFT MICHIGAN,

Plaintiff,

v.

PROJECT VERITAS, et al,

Defendants.

Case No. 17-13292
Hon. Linda V. Parker
Hon. Elizabeth A. Stafford

AFFIDAVIT OF RUSSELL VERNEY

I, Russell Verney, am over the age of eighteen years of age, am competent to testify, have personal knowledge of the matters to which I testify below, and hereby declare as follows:

1. I submit this declaration in support of Project Veritas's response to AFT Michigan's motion to compel discovery of the names of Project Veritas donors. ECF No. 134. I am familiar with AFT Michigan's claims, and I make these statements based on my personal knowledge. The facts set forth in this affidavit are true to my knowledge.
2. Since 2014, I have served as Executive Director of Project Veritas. In this capacity, I have assisted James O'Keefe in fundraising, hosting donor

meetings, talking with donors about giving, and helping structure donations.

3. In arranging for donors to give to Project Veritas, a substantial number elect to employ a “donor-advised account.” In 2018, the most recent year Project Veritas was audited, 31.6 percent of contributions to it originated from donor-advised accounts. This percentage remains similar to previous years. For donor-advised accounts, a donor places his contributions in an account and can recommend grants to public charities while still receiving a tax deduction. On information and belief, donors do this to preserve their own anonymity.
4. Throughout the years of working with donors to Project Veritas and addressing their concerns, privacy and confidentiality of their identities remain a top priority. Many donors have specific inquiries about how their anonymity will be protected, how Project Veritas protects against intentional or unintentional leaks of this information, and have stated that it is important to keep their names confidential.
5. Project Veritas takes every feasible step to protect donor confidentiality internally. This includes requiring all staff, board members, independent contractors, vendors, and visitors to the office to sign a confidentiality agreement which safeguards, among other things, donor information.

Donor identities are kept confidential and only disclosed even internally on a “need to know” basis, and such information is password protected and encrypted so that only a few select executives and development associates have access to donors’ actual names. In discovery, Project Veritas endeavors to redact donor names from all internal and external communications.

6. In securing a variety of donations to Project Veritas, many donors have expressly stated that they would no longer give to the organization if it failed to keep these names confidential and protected. Project Veritas has been mindful of these concerns and structured its operations to protect donor privacy such that it may continue to exist, gather news, and publish stories of public concern.
7. Some donors share personal concerns that their economic livelihoods might be ruined if their association with Project Veritas is made public. Donors worry that public pressure and harassment campaigns would mount, doing injury to their own lives. It is for these reasons that donors often insist upon anonymity for any contributions given.
8. Unlike most other news organizations, Project Veritas does not rely upon advertising revenue, subscriptions, or commercial funding to sustain its operations. Rather, it is operated as a 501(c)(3) organization under the

Internal Revenue Code and nearly one hundred percent of its budget comes from donors who support its mission. Without these donations, Project Veritas would not be able to continue its operations.

Pursuant to 28 U.S.C. § 1746, I, Russell Verney, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed May 11, 2020.

By: 
Russell Verney

Notary:

State of Indiana

County of Hamilton

This record was acknowledged before me on 5/11/2020 (date)
by Russell Verney (name of individual).

Signature of notarial officer 

Stamp



CECILIA GENTRY
HAMILTON COUNTY
My Commission Expires
JULY 16, 2027
NP0721350

Title of office Manager / Owner The UPR store #0973

My commission expires July 16 2027